

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

FEDERAL HOUSING ADMINISTRATION



SINGLE FAMILY HOUSING

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- FHA FAQ page: https://www.hud.gov/FHAFAQ
- Single Family Housing Archived (On Demand) Webinar's page:
 https://www.hud.gov/program_offices/housing/sfh/events/sfh_webinars







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SINGLE FAMILY HOUSING

Office of Lender Activities and Program Compliance

FHA Quality Assurance Update

December 15, 2021

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Last Updated: 12/2/2021

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Agenda

Loan Review Results

Top Underwriting Findings

Top Servicing Findings

Resources

Q&A





Loan Review Results





Loan Review Volume: Underwriting

Selection Reason	CY20 Q4	CY21 Q1	CY21 Q2	CY21 Q3	# Completed	# Net Material	% Net Material
Early Payment Defaults	2,789	2,988	4,081	4,094	13,952	927	6.6%
Lender Self-Reports	1,282	500	1,507	763	4,052	1,570	38.8%
Risk Algorithm	1,353	2,057	217	47	3,674	346	9.4%
Lender Monitoring	320	572	873	755	2,520	261	10.4%
Review Location Quality Control (QC)	245	222	263	283	1,013	47	4.6%
Test Case	122	145	183	152	602	27	4.5%
FHA Manual Selections	135	150	104	105	494	192	38.9%
Random Selections	212	15	4	3	234	18	7.7%
Early Claims	27	78	72	11	188	21	11.2%
OIG Audit	0	0	18	14	32	17	53.1%
Total	6,485	6,727	7,322	6,227	26,761	3,426	12.8%

Loan Review System (LRS) reviews completed from 10/1/2020 to 9/30/2021





Loan Review Volume: Servicing

Selection Reason	CY20 Q4	CY21 Q1	CY21 Q2	CY21 Q3	# Completed	# Net Material	% Net Material
Lender Monitoring	197	136	241	287	861	38	4.4%
Lender Self-Reports	160	59	215	118	552	30	5.4%
FHA Manual Selections	1	44	22	19	86	2	2.3%
Review Location Quality Control (QC)	10	0	6	1	17	0	0%
Total	368	239	484	425	1,516	70	4.6%

Loan Review System (LRS) reviews completed from 10/1/2020 to 9/30/2021

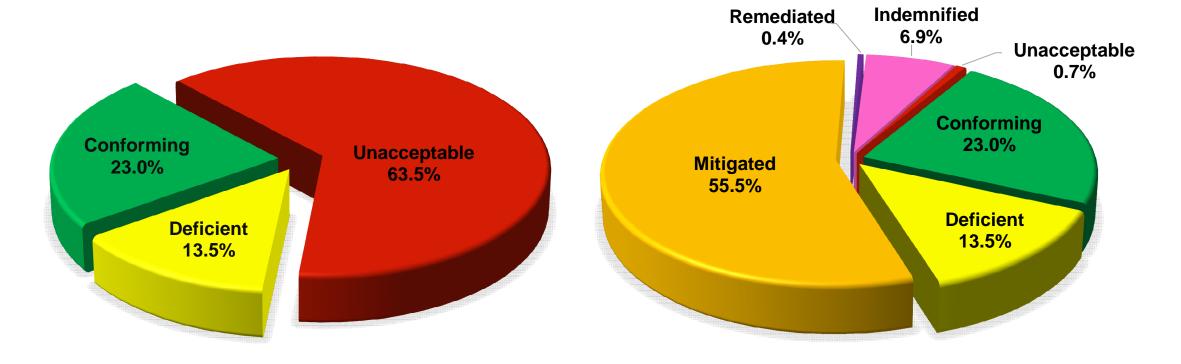




Quarterly Ratings and Outcomes

Initial Ratings (Gross)

Final Ratings (Net)



LRS reviews completed from 10/1/2020 to 9/30/2021 (excluding lender self-reports and internal QC)





Quarterly Loan Review Summary

Completed Quarter(s): 2021 Q3, 2021 Q2, 2021 Q1, 2020 Q4 (calendar year)

Location(s): All

Sample: Total (performing and non-performing loans, excluding lender self-reports and internal QC)

Material Defects

Qtr	# of Loans	Gross#	Gross %	Net#	Net%
2020 Q4	5,191	3,355	64.6%	375	7.2%
2021 Q1	6,206	3,742	60.3%	426	6.9%
2021 Q2	5,835	3,853	66.0%	540	9.3%
2021 Q3	5,513	3,501	63.5%	494	9.0%

60% 50% Gross % 40% Net % 30% 20% 10%

Review Ratings #

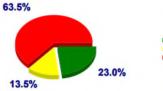
Quarter	Conforming	Deficient	Mitigated	Remediated	Indem	Other
2020 Q4	1,057	779	2,980	27	303	45
2021 Q1	1,536	928	3,316	28	346	52
2021 Q2	1,322	660	3,313	20	479	41
2021 Q3	1,317	695	3,007	23	442	29
Total	5,232	3,062	12,616	98	1,570	167

Review Ratings %

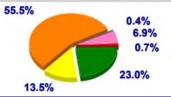
70%

Quarter	Conforming	Deficient	Mitigated	Remediated	Indem	Other
2020 Q4	20.4%	15.0%	57.4%	0.5%	5.8%	0.9%
2021 Q1	24.8%	15.0%	53.4%	0.5%	5.6%	0.8%
2021 Q2	22.7%	11.3%	56.8%	0.3%	8.2%	0.7%
2021 Q3	23.9%	12.6%	54.5%	0.4%	8.0%	0.5%
Total	23.0%	13.5%	55.5%	0.4%	6.9%	0.7%















Deficient

Top Underwriting Findings





Top Underwriting Findings

Defect Area	% of Net Material
Borrower Income	19%
Borrower Credit	18%
Lender Operations	18%
Borrower Assets	15%
Property Eligibility	10%
Mortgage Eligibility	6%
Borrower Eligibility	6%
LTV/Max Mortgage Amount	5%
Property Appraisal	4%

⁻ Represents underwriting findings in LRS reviews completed from 10/1/2020 to 9/30/2021.





⁻ Percentages based on the total number of net material findings in each defect area.

⁻ Excludes lender self-reports and internal QC.

Borrower Income

Source	Cause	Frequent Examples
Salary or Hourly Wages from Primary Employment	History, stability, and/or continuance not supported	 → Borrower's most recent two years of employment and income, from current employment and/or and past employment not documented. → Stability of income not supported based on gap in employment of six months or more because borrower was not employed on current job for at least six months at the time of case number assignment and/or two-year work history prior to gap in employment was not documented.
	Effective income improperly calculated or not supported by documentation	 → Borrower employment income was not averaged over the previous two years as required for hourly employees with variable hours. → Self-employment income was not calculated based on the average gross self-employment income earned over the previous two years.
Self-Employment	Issues concerning required documentation or verifications	 → Borrower was self-employed for less than two years and was not previously employed in the same line of work or in an occupation related to self- employment. → Documentation reveals self-employment loss that was not subtracted from the borrower's gross monthly qualifying income as required.





Borrower Income (cont.)

HUD Policy References

Single Family Housing Policy Handbook 4000.1, Section II.A.

- **1.b.ii(A)** General Borrower Eligibility Requirements
 - **4.a** Underwriting with an Automated Underwriting System
 - **4.c** Income Requirements (TOTAL)
 - **4.e** Final Underwriting Decision (TOTAL)
 - **5.b** Income Requirements (Manual)
 - **5.d** Final Underwriting Decision (Manual)

References are not all-inclusive



Borrower Credit

Source	Cause	Frequent Examples
Monthly Obligations	Required documentation not included in loan file.	 → Account or payment history not included in borrower's credit report. → Unresolved discrepancies or conflicting information related to liabilities or debt. → Insufficient compensating factors or debt ratio exceeds the FHA maximum for manually underwritten borrowers.
Mortgage Payment History	Amount not supported or improperly calculated. FHA standards not met.	 → Borrower approval and eligibility for FHA refinance not supported based on insufficient or unacceptable payment history. → FHA is unable to determine eligibility/underwriting compliance or cannot calculate monthly debts/obligations based on loan documentation.





Borrower Credit (cont.)

HUD Policy References

Single Family Housing Policy Handbook 4000.1, Section II.A.

- **1.b.ii(A)** General Borrower Eligibility Requirements
 - **4.a** Underwriting with an Automated Underwriting System
 - **4.b** Credit Requirements (TOTAL)
 - **4.e** Final Underwriting Decision (TOTAL)
 - **5.a** Credit Requirements (Manual)
 - **5.d** Final Underwriting Decision (Manual)

References are not all-inclusive



Top Servicing Findings





Top Servicing Findings

Defect Area	% of Net Material
Delinquent & Default Servicing	33%
Loss Mitigation	32%
General Servicing	19%
Foreclosure Processing	7%

- Represents servicing findings in LRS reviews completed from 10/1/2020 to 9/30/2021.
- Percentages based on the total number of net material findings in each defect area.
- Excludes lender self-reports and internal QC.





Delinquent and Default Servicing

Source	Cause	Frequent Examples
Delinquency or Default Status	FHA reporting requirements not met	 → Reason for default, default status date, or oldest unpaid installment date not accurately reported to FHA. → Occupancy status and/or date of occupancy determination inaccurately reported. → Presidentially-Declared COVID-19 National Emergency related reporting errors.
Servicing File	Record retention requirements not met	 → FHA is unable to determine delinquent and default servicing compliance due to missing or incomplete individual servicing account records. → Original loan documents, individual account history, or servicing records not maintained or preserved as required during servicing transfer.





Delinquent and Default Servicing (cont.)

HUD Policy References

Single Family Housing Policy Handbook 4000.1, Section III.A.

- 2.a Mortgages in Delinquency or Default
- **2.b** HUD Default Servicing Contact
- 2.c Reporting to Consumer Reporting Agencies and the IRS
- **2.d** Late Charges
- **2.e** Partial Payments for Mortgages in Default
- 2.f Lien Status
- **2.o** Presidentially-Declared COVID-19 National Emergency
 - **3.** Programs and Products

References are not all-inclusive





Loss Mitigation

Source	Cause	Frequent Examples
Loss Mitigation Status	Reporting requirements not met	 → Stage of loss mitigation review was not reported to FHA using the accurate Delinquency Workout Status Code. → Servicer initiated foreclosure but did not ensure complete or accurate reporting of Ineligible for Loss Mitigation Code.
Loss Mitigation Waterfall Options	Unallowable or improperly calculated amounts	 → Servicer did not complete review of loss mitigation request to determine whether the borrower qualified for a Loss Mitigation Option as required. → Unallowable or improperly calculated amount included in total outstanding debt to be resolved or capitalized and/or loan was not brought current for the month due through completion of loan modification and/or partial claim.
Financial Evaluation	Issues with required documentation	 → Determination of eligibility for Home Retention or Home Disposition Option is not supported based on documents retained in the servicing file. → Borrower was not properly evaluated for loss mitigation in accordance with Presidentially-Declared COVID-19 National Emergency specific provisions.





Loss Mitigation (cont.)

HUD Policy References

Single Family Housing Policy Handbook 4000.1, Section III.A.

- 2.i Loss Mitigation Review Process
- **2.j** HUD's Loss Mitigation Program
- **2.m** Loss Mitigation Incentives
- **2.n** Presidentially-Declared Major Disaster Areas
- **2.o** Presidentially-Declared COVID-19 National Emergency
- **3.** Programs and Products

References are not all-inclusive





Resources





Resources

LRS Information Page

https://www.hud.gov/program_offices/housing/sfh/lender/loan_review_system

LRS User Manual

FHA Defect Taxonomy

Webinars

LOAN REVIEW SYSTEM

The Loan Review System (LRS) is the electronic platform for most Federal Housing Administration (FHA) Title II Single Family quality assurance review processes, including:

- · Various Post-Endorsement Loan Reviews
- · Unconditional Direct Endorsement Authority Test Cases
- · Lender Monitoring Reviews
- · Lender Self-Reporting of Fraud and Other Material Findings

Home / Program Offices / Housing / Single Family / Lenders / Loan Review System

Functions and Features

- · Communicates findings using FHA's Defect Taxonomy
- · Consolidates most quality assurance functions into one system
- · Automates various manual processes and communications
- · Organizes and prioritizes requests for lender responses
- Streamlines submission of required documents
- · Enhances loan quality reporting and analytics
- · LRS User Manual Updated January 1, 2020

FHA Defect Taxonomy

The Defect Taxonomy is FHA's method of identifying defects at the loan-level. It provides clarity and transparency into existing FHA quality assurance processes and is used to describe findings through the Loan Review System (LRS) based on HUD policy requirements. The FHA Defect Taxonomy provides useful data and feedback through structured categorization of defects and their sources, causes, and severities. For more predictable review outcomes, potential remedies that align with severity tiers are listed in each defect area.

Appendix 8.0 – FHA Defect Taxonomy includes the content implemented with version 2 of the Defect Taxonomy, effective for loan reviews as of January 1, 2020. It supersedes the originally published version which was implemented through LRS in 2017 and applicable for loan reviews through December 31, 2019. Appendix 8.0 – FHA Defect Taxonomy is part of the FHA Single Family Housing Policy Handbook 4000.1.

Loan Review Resources

LRS User Manual

Discontinued December 31, 2019

Defect Taxonomy Version 1

Quality Assurance Webinars

Take advantage of FHA's online webinar offerings to stay up-to-date on quarterly quality assurance results, most common findings, and additional guidance for lenders related to quality assurance processes.

- * UPCOMING SINGLE FAMILY HOUSING EVENTS AND TRAINING
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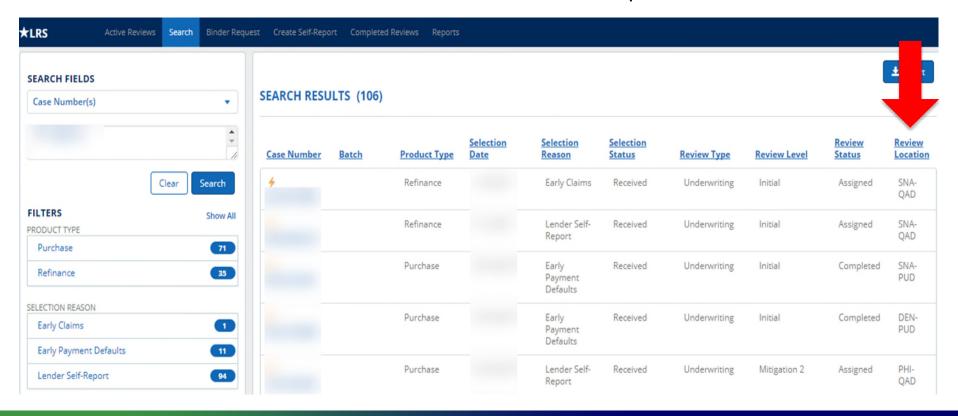




Resources (cont.)

FHA Resource Center

- When inquiring about a specific LRS review, lenders must provide <u>FHA Case Number</u> and <u>review location</u>.
 - Review location is shown on the LRS Search screen, the Binder Request screen, or the Review Data tab.







Resources (cont.)

	Option	Point of Contact	Hours Available	Comments
1	FHA Knowledge Base – FAQs	www.hud.gov/answers	24/7/365	Knowledge Base web page includes option to email questions.
2	Email	answers@hud.gov	24/7/365	
3	Telephone	1-800-CALL-FHA (1-800-225-5342) Persons with hearing or speech impairments may reach this number by calling the Federal Relay Service at 1-800-877-8339.	8:00 AM to 8:00 PM Eastern M-F	Voicemail is available after hours or during extended wait periods.
	FHA INFO emails: Frequency	uent email notifications of new policies and	training opportunities for anyone	who signs up. Subscribe at:





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Helpful Links

- FHA Single Family Information Page
 https://www.hud.gov/program_offices/housing/sfh
- Single Family Housing Policy Handbook 4000.1
 https://www.hud.gov/program_offices/housing/sfh/handbook_4000-1
- Single Family Drafting Table
 https://www.hud.gov/program offices/housing/sfh/sfh policy drafts
- FHA National Servicing Center
 https://www.hud.gov/program_offices/housing/sfh/nsc
- FHA Servicing and Loss Mitigation Training
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